

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

UNITED STATES OF AMERICA,	)	
	)	Criminal No. 1:18-cr-00083-TSE
v.	)	
	)	
	)	
PAUL J. MANAFORT, JR.,	)	
	)	Judge T. S. Ellis, III
Defendant.	)	

**PAUL J. MANAFORT, JR.'S MOTION TO SEAL  
CERTAIN PORTIONS OF AUGUST 7, 2018 SIDEBAR CONFERENCE**

Paul J. Manafort, Jr., by and through counsel, hereby submits this motion to seal certain portions of a sidebar conference held on August 7, 2018 pursuant to Local Criminal Rule 49(E). A proposed order and a supporting memorandum accompany this motion.

Dated: August 21, 2018

Respectfully submitted,

s/ Kevin M. Downing  
Kevin M. Downing (*pro hac vice*)  
Law Office of Kevin M. Downing  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 754-1992  
[kevindowning@kdowninglaw.com](mailto:kevindowning@kdowninglaw.com)

s/ Thomas E. Zehnle  
Thomas E. Zehnle (VSB No. 27755)  
Law Office of Thomas E. Zehnle  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 368-4668  
[tezehnle@gmail.com](mailto:tezehnle@gmail.com)

s/ Richard W. Westling  
Richard W. Westling (*pro hac vice*)  
Epstein Becker & Green, P.C.  
1227 25th Street, N.W.  
Washington, DC 20037  
(202) 861-1868  
[rwestling@ebglaw.com](mailto:rwestling@ebglaw.com)

s/ Jay R. Nanavati  
Jay R. Nanavati (VSB No. 44391)  
Brian P. Ketcham (*pro hac vice*)  
Kostelanetz & Fink LLP  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 875-8000  
[jnanavati@kflaw.com](mailto:jnanavati@kflaw.com)

*Counsel for Defendant Paul J. Manafort, Jr.*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>st</sup> day of August 2018, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Andrew A. Weissman

Greg D. Andres

Uzo Asonye

U.S. Department of Justice  
Special Counsel's Office  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
Telephone: (202) 616-0800  
Email: [AAW@usdoj.gov](mailto:AAW@usdoj.gov)  
[GDA@usdoj.gov](mailto:GDA@usdoj.gov)  
[Uzo.Asonye@usdoj.gov](mailto:Uzo.Asonye@usdoj.gov)

s/ Jay R. Nanavati

Jay R. Nanavati (VSB No. 44391)  
Kostelanetz & Fink LLP  
601 New Jersey Avenue NW  
Suite 620  
Washington, DC 20001  
(202) 875-8000  
[jnanavati@kflaw.com](mailto:jnanavati@kflaw.com)

*Counsel for Defendant Paul J. Manafort, Jr.*